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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

C.M., on her own behalf and on behalf of her minor child, B.M.; L.G., on her own behalf and on behalf of her minor child, B.G.; M.R., on her own behalf and on behalf of her minor child, J.R.; O.A., on her own behalf and on behalf of her minor child, L.A.; and V.C., on her own behalf and on behalf of her minor child, G.A..

Plaintiffs,

V.

United States of America,

Defendant.

No. 2:19-CV-05217-PHX-SRB

**SIXTH STIPULATED
MOTION TO HOLD
ACTION IN ABEYANCE**

A.P.F. on his own behalf and on behalf of his minor child, O.B.; J.V.S. on his own behalf and on behalf of his minor child, H.Y.; J.D.G. on his own behalf and on behalf of his minor child, M.G.; H.P.M. on his own behalf and on behalf of his minor child, A.D.; M.C.L. on his own behalf

No. 2:20-CV-00065-PHX-SRB

1 and on behalf of his minor child, A.J.; and R.Z.G.
2 on his own behalf and on behalf of his minor
3 child, B.P.,

4 Plaintiffs,

5 v.

6 United States of America,

7 Defendant.

8 The parties jointly move the Court for an order holding this action in abeyance
9 for an additional period of forty (40) days while the parties continue to engage in
10 settlement negotiations. In support of this motion, the parties respectfully state the
11 following:

12 On September 30, 2021, the parties moved the Court to hold the action in
13 abeyance for an additional sixty (60) days for the parties to continue to focus their
14 attention on their ongoing settlement efforts. *C.M.* ECF 112; *A.P.F.* ECF 110. On
15 September 30, 2021, the Court granted that motion, holding the case in abeyance until
16 November 30, 2021, at which time the parties were to advise the Court whether an
17 additional abeyance was sought. *C.M.* ECF 113; *A.P.F.* ECF 111.

18 The parties continue to engage in settlement discussions, and require additional
19 time for ongoing discussions. A further abeyance will allow the parties to continue
20 focusing their efforts on attempting to resolve these matters.

21 In order to facilitate continued progress, the parties respectfully move the
22 Court for an order holding this action, including all proceedings and case deadlines, in
23 abeyance for an additional period of forty (40) days, for the parties to continue to
24 focus their attention on these settlement efforts. The parties propose that, at the close
25 of this additional 40-day abeyance period, the parties may, depending on the progress
26 of the settlement discussions, seek an additional abeyance from the Court. If an
27

1 additional abeyance is not sought, the parties request that any existing deadlines be
2 reset for an additional forty (40) days from the current deadlines.

3 Counsel for Plaintiffs and the United States have conferred regarding this
4 request and agreed to jointly move the Court to hold this action in abeyance. The
5 party submitting this motion has obtained the permission of all signatories hereto. A
6 proposed Order is submitted herewith.

7 Respectfully submitted this 30th day of November, 2021.
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* Admitted pro hac vice

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on November 30, 2021, I electronically transmitted the
3 attached document to the Clerk's Office using the CM/ECF System for filing and
4 transmittal of a Notice of Electronic Filing to all CM/ECF registrants.

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6 *s/ Phil MacWilliams*
7 PHILIP D. MACWILLIAMS
Attorney for United States of America

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